

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

DISPLAY TECHNOLOGIES, LLC,

Plaintiff,

v.

SONY CORPORATION OF AMERICA,

Defendant.

Case No. 1:22-cv-00488-LJL

JURY TRIAL DEMANDED

**NOTICE OF DEFENDANT SONY'S FED. R. CIV. P. 12(b)(6) MOTION TO DISMISS
FOR UNPATENTABLE SUBJECT MATTER UNDER 35 U.S.C. § 101**

PLEASE TAKE NOTICE that, pursuant to Fed. R. Civ. P. 12(b)(6) and upon the concurrently filed Memorandum of Law, Defendant Sony Corporation of America ("Sony") respectfully moves this Court for an Order dismissing with prejudice the Complaint (Dkt. No. 1) of Plaintiff Display Technologies, LLC, and for such other and further relief as the Court deems just, necessary, and proper. The grounds for Sony's motion are that the asserted claims of Plaintiff's U.S. Patent No. 9,300,723 (Dkt. No. 1, Ex. A) are not eligible for patenting under 35 U.S.C. § 101. Sony respectfully requests that the Court hold oral argument on its motion to dismiss.

Date: April 11, 2022

Respectfully submitted,

/s/ Lewis V. Popovski

Lewis V. Popovski
Ryan J. Sheehan
George S. Soussou
PATTERSON BELKNAP WEBB & TYLER LLP
1133 Avenue of the Americas
New York, NY 10036-6710
(212) 336-2000
lpopovski@pbwt.com
rsheehan@pbwt.com
gsoussou@pbwt.com

***Attorneys for Defendant Sony
Corporation of America***

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system on April 11, 2022.

/s/ Lewis V. Popovski